

Secretary  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of

Amendment of Part 97 of the )  
Commission's Rules to Eliminate )  
Certain One-Way Communications in ) RM No. 8626  
the Amateur Radio Service Medium )  
and High Frequency Bands )

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To the Secretary

Having reviewed the complete text Mr. Maia's Petition for Rulemaking, RM-8626, I must state that I am completely opposed to this proposed elimination of one-way communications in the Amateur Radio Service Medium and High Frequency Bands.

*The Commenter*

I hold an Amateur Extra Class license, and was first licensed in 1970 at the age of 13. I found the one-way broadcasts of W1AW specifically, and other stations acting in similar capacity to be extremely helpful in obtaining my initial Novice license. Also, it proved most useful to me in obtaining higher speed code proficiency through code practice.

These one way broadcasts Mr. Maia seeks to eliminate served me well in other capacities as well. The broadcasts of Amateur Radio related information served to keep my interest fresh. I became an avid member of the community of traffic handlers, and became the youngest person to ever obtain the Brass Pounder's League medallion, for traffic handling. In my capacity as an Official Relay Station, and communication officer for the American Red Cross, I found the information contained in these broadcasts to be of benefit in my ability to perform the public service Radio Amateurs are known for providing.

*No Need for Rule Changes*

Mr. Maia's states that one-way communications are a source of interference and are the primary cause of "anger" on the bands. While one-way communications do, on occasion, cause interference to others operating on the same frequencies, these frequencies are well published and have been known throughout the amateur community for longer than I have been licensed. This "anger" is caused by the operators themselves, who chose to become frustrated about the necessity to change frequency enough to avoid being interfered with. These same angry operators would

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chose to rail against anything and everything that they perceive to have affronted them in the least possible way. Eliminating one-way broadcasts will not eliminate this anger, it will just redirect it to something else.

The FCC has in several instances recognized the value of one-way communications to the Amateur community and has exempted those communications from the need to establish a clear channel prior to broadcast. In other areas the FCC has recognized that for the general good of all, the rights of a specific individual to use any authorized frequency available for communication is secondary. An example of this the channalization of the VHF bands for use with repeaters. No one operating on the output of a properly coordinated repeater can claim that they were interfered with by the repeater.

Mr. Maia contends that "bulletins and code practice are the exceptions and not the rule" for one-way broadcasts. In my experience, I frankly have never experienced anything other than bulletins or code practice being broadcast by a station operating on known frequencies and with a known schedule. I believe bulletins and code practice are the rule. Anything else is such an exception that I have never experienced it.

Mr. Maia states that the time for these one-way broadcasts has passed, that "plenty of other methods of communicating general information to Amateurs" exist. While other methods do exist, and I myself take advantage of them (specifically VHF Packet Networks, and Internet), I still find the HF broadcasts to be of value. To begin with, they are available without the purchase of additional specialized equipment (Packet TNC, modems, commercial information services). These signals on the HF frequencies also serve other purposes. For start, they provide a means of developing an ability to communicate under realistic circumstances, (noise and interference conditions). They have also served as test broadcasts. I have used them myself to develop home made equipment (specifically, modems) that have served to maintain my interest in the technical side of the hobby. No other service is capable of providing these benefits other than the HF broadcasts.

### *Hidden Agenda?*

I am concerned that Mr. Maia may have a hidden agenda in his request for proposed rule making. Mr. Maia is involved in for profit enterprises associated with Amateur Radio. Perhaps he is more interested in increasing the value of his commercial operations by eliminating competing free broadcasts of code practice and information? Of course I can not know for sure what his agenda really is, but I have experienced his "concern" for the greater good of Amateur Radio first hand. I received, shortly before my most recent license renewal, a letter from one of his organizations, offering to renew my Amateur Radio License for a \$5.00 processing fee. He included a crude copy of the FCC 610 form with his organization's mailing address and fee request inserted. His "service" consisted of forwarding the form onto the appropriate FCC

office. Ironically enough, the ARRL provided actual FCC forms, unsolicited and for free, shortly after the W5YI mailing.

*Conclusion*

I believe a great service is provided to the Amateur Radio community at large by the operation of one-way broadcast stations in the HF frequencies. The elimination of these broadcasts to appease the "anger" of a few malcontents would be a disservice to the greater majority. Mr. Maia presented no evidence to support his conclusions. I urge the Commission to deny Mr. Maia's petition for rulemaking, RM-8626. I have filed a copy of these comments with Mr. Maia's Counsel.

Respectfully submitted,

A handwritten signature in cursive script, reading "Robert M Beatty". The signature is fluid and stylized, with a long horizontal stroke at the end.

Robert M. Beatty, WB4SON  
104 Hatheway Drive  
West Warwick, RI 02893

Dated April, 4, 1995